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September 14, 2021

The Honorable Judge Laura T. Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Kwang Kyu Kim, et al.*, 18 Cr. 882 (LTS)

Dear Judge Swain:

This law firm represents Tien Chih Wang, a defendant in *USA v. Kwang Kyu Kim, et al.*, 18 Cr. 882 (LTS). On April 13, 2021, a final judgment was entered against Mr. Wang for time served, three years of supervised release, forfeiture, a fine and a special assessment. *See*, Dkt. No. 235. He remains fully compliant with all his obligations under the judgement.

On June 22, 2021, Your Honor graciously granted a modification of Mr. Wang's conditions of supervised release concerning domestic travel. Through the entirety of the matter, Mr. Wang has never had any issue abiding by the conditions of pre-trial services and was at all times compliant with their mandates. Likewise, he has dutifully followed all the mandates of his supervised release and will continue to do so.

Mr. Wang respectfully requests an additional minor amendment to the conditions of his supervised release to permit him to travel to Taiwan to see his mother, who is having health concerns. Recently, Mr. Wang's 85-year-old mother had a fall and suffered cerebral hemorrhaging. She has had an extended hospital stay and Mr. Wang would appreciate the opportunity to travel to Taiwan to see his mother and assist in whatever way he can. He will provide a full itinerary to supervised release for all travel and lodging.

I have spoken to AUSA Thane Rehn regarding this request and the Government has no objection to Mr. Wang traveling to Taiwan for a family visit. Supervised release has also indicated that it has no objection to the trip.

Thank you for the Court's time and consideration. I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,

ROBERT C. GOTTLIEB
& ASSOCIATES PLLC


Robert C. Gottlieb

cc: Nathan Rehn, A.U.S.A.

The foregoing request is hereby granted. Docket entry no. 241 is resolved.

SO ORDERED.

9/14/2021

/s/ Laura Taylor Swain, Chief USDJ